

Presentment Date and Time: November 24, 2009 at 12:00 p.m. (Prevailing Eastern Time)
Objection Deadline: November 23, 2009 at 12:00 p.m. (Prevailing Eastern Time)
Hearing Date and Time (if required): December 16, 2009 at 10:00 a.m. (Prevailing Eastern Time)

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Attorneys for Anton R. Valukas, Esq., Examiner

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER BETWEEN THE
EXAMINER AND THE BANK OF NEW YORK MELLON CORPORATION**

PLEASE TAKE NOTICE that the undersigned will present the attached Confidentiality Stipulation and Protective Order Between the Examiner and The Bank of New York Mellon to the Honorable James M. Peck, United States Bankruptcy Judge, for signature on November 24, 2009, at 12:00 p.m. (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed Confidentiality Stipulation and Protective Order must comply with the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Local Rules of the United States Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be

found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq., and Jacqueline Marcus, Esq.), attorneys for the Debtors; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis, Esq.); (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.), attorneys for the Official Committee of Unsecured Creditors; (v) Dewey & LeBoeuf LLP, 1301 Avenue of the Americas, New York, New York 10019 (Attn: Seth C. Farber, Esq. and Kelly A. Librera, Esq.), attorneys for The Bank of New York Mellon Corporation; and (vi) Jenner & Block LLP, 919 Third Avenue, 37th Floor, New York, New York 10022-3908 (Attn: Patrick J. Trostle, Esq.), attorneys for the Examiner; so as to be filed and received by no later than 12:00 p.m. (Prevailing Eastern Time) on November 23, 2009 (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that only if a written objection is timely filed and served, a hearing will be held on December 16, 2009, at 10:00 am. (Prevailing Eastern Time) at the United States Bankruptcy Court for the Southern District of New York, Honorable James M. Peck, United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408.

If an objection is filed, the moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default. If no objections are received by the Objection Deadline, the proposed Stipulation and Order may be signed and entered by the Bankruptcy Court.

Dated: November 17, 2009
New York, New York

Respectfully submitted,

By: /s/ Patrick J. Trostle
Patrick J. Trostle

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